

UNITED STATES DISTRICT COURT FOR THE
FOR THE DISTRICT OF DELAWARE

MITAS ENDUSTRI SANAYI TICARET A.S. : Civil Action No. _____

Plaintiff : _____

v. : _____

VALMONT INDUSTRIES, INC. : _____

Defendant. : _____

RULE 7.1.1 CERTIFICATION

Pursuant to D. Del. LR 7.1.1, I hereby certify that counsel for Plaintiff Mitas Endustri Sanayi Ticaret A.S. (“**Mitas**”), on July 6, 2020, sent a letter to the General Counsel of Defendant Valmont Industries, Inc. (“**Valmont**”) notifying Defendant of the nature of Plaintiff’s claims, but received no response. Plaintiff remains unaware of whether Defendant has retained any outside counsel in this matter, let alone Delaware counsel. Due to the emergency nature of this application, Plaintiff submits its claims at this time and will of course make prompt efforts to attempt to resolve the issues set forth in the accompanying Motion as soon as Delaware counsel enters an appearance on behalf of Defendant in this matter.

September 24, 2020

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